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7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**

9 Sean Bondocan,

Case No.: 2:23-cv-1334 -JCM-VCF

10 Plaintiff,

**Unopposed Motion for Extension of
Time for TransUnion to Answer
(First Request)**

11 v.

12 Trans Union, LLC; Equifax Information Services,
13 LLC; Experian Information Solutions, Inc.; JP
14 Morgan Chase Bank, N.A.; Synchrony Financial;
American Express Inc.; Capital One Bank, N.A.;
and Silver State Schools Credit Union,

15 Defendants.

16 Sean Bondocan (“Plaintiff”), hereby files this Unopposed Motion for Extension of Time for
17 TransUnion to Answer (“Motion”) and in support states:

- 19 1. TransUnion’s responsive pleading is due on September 20, 2023.
- 20 2. Plaintiff and Trans Union are actively engaged in case-resolution negotiations.
- 21 3. Plaintiff does not oppose an extension of Trans Union’s time to respond to the Complaint so
22 that the parties may devote their energies to resolving this matter.
- 23 4. Plaintiff files this Motion consistent with its agreement with TransUnion and further files this
24 Motion respectfully requesting the Court for an extension of time for TransUnion to file its
25 responsive pleading for 21 days, to **Wednesday, October 11, 2023**.
- 26 5. This motion is filed in good faith and not for delay.
- 27 6. This is the first request for an extension of time for TransUnion to answer the complaint and
28 the requested extension does not prejudice the parties.

1 7. For the foregoing reasons, Plaintiff requests that the Court issue an order extending the date
2 by which TransUnion must answer or otherwise respond to Plaintiff's Complaint to **October**
3 **11, 2023.**

4 DATED September 20, 2023.
5

6 Respectfully submitted,
7

8 **FREEDOM LAW FIRM**

9 */s/ Gerardo Avalos* _____
10 George Haines, Esq.
11 Gerardo Avalos, Esq.
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13 Las Vegas, NV 89123
14 Counsel for Plaintiff

15 **GOOD CAUSE SHOWN, IT IS SO ORDERED.**

16 Dated 9-21-2023

17 
18 _____
19 UNITED STATES MAGISTRATE JUDGE